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**PERSONAL**  
**CONFIDENTIAL**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

**Rochester Division**

*Case No. 25cv6036*

**Adam-Eli: Stauffer**

Plaintiff,

v.

**The County of Monroe et al**  
Defendants.

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**NOTICE OF CLAIM, MOTION FOR SUMMARY JUDGMENT, TEMPORARY RESTRAINING  
ORDER, INJUNCTION, AND PRAYER FOR RELIEF WITH FULL DISCLOSURE UNDER THE  
COLOR OF LAW**

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**I. PRELIMINARY STATEMENT**

This case arises as a testament to faith, justice, and the unwavering belief in the inherent rights granted by our Creator and protected under the Constitution of the United States. This honorable Court is called upon to affirm these rights through its authority under the Full Faith and Credit Clause of the U.S. Constitution (Article IV, Section 1) and to safeguard justice against violations of the law perpetrated under the color of law as defined in 18 U.S.C. §§ 241 and 242.

Plaintiff, **Adam-Eli: Stauffer**, seeks justice and restoration of his rights following a false arrest and deprivation of parental rights, and demands transparency, accountability, and full disclosure of all actions taken by the Defendants in this case.

This action invokes the Court's duty to ensure adherence to the principles of liberty, equality, and fairness, which are the foundation of the United States and its laws.

**II. JURISDICTION AND VENUE**

This Court has jurisdiction pursuant to:

28 U.S.C. § 1331 (federal question jurisdiction);

28 U.S.C. § 1343 (civil rights jurisdiction);



*18 U.S.C. § 241 (conspiracy to violate constitutional rights);*

*18 U.S.C. § 242 (deprivation of rights under color of law).*

Venue is proper under *28 U.S.C. § 1391(b)* as the events giving rise to this claim occurred within the Western District of New York.

The Court is further called to exercise its authority under the Full Faith and Credit Clause to ensure recognition of lawful documents, including the Certificate of Disposition under *N.Y. CPL § 160.50* and other legal notices provided by the Plaintiff.

### **III. PARTIES**

Plaintiff: Adam-Eli: Stauffer, a resident of Rochester, New York, is a devoted father, Minister of the Hip Hop Church of Christ, and founder of e2 Studios ([www.e2studios.art](http://www.e2studios.art)). His work includes partnering with John Monroe High School to mentor and inspire students, fostering a community rooted in love and faith.

Defendants: The County of Monroe and its agents, including law enforcement officials acting under the authority of Monroe County, are named in their official and individual capacities for their roles in the acts complained of herein.

### **IV. FACTUAL BACKGROUND**

#### **A. Violation of Plaintiff's Rights Under the Color of Law**

On November 10<sup>th</sup> 2023, Plaintiff was falsely arrested by Monroe County law enforcement officials without probable cause or lawful justification. This arrest was conducted under the color of law in violation of Plaintiff's constitutional rights.

The Certificate of Disposition issued under *N.Y. CPL § 160.50* conclusively demonstrates that the charges against Plaintiff were baseless, further affirming the unlawful nature of the arrest.

#### **B. Deprivation of Parental Rights and Family Integrity**

Plaintiff's false arrest resulted in an unjust deprivation of his natural and constitutional rights as a parent. These actions disrupted his sacred relationship with his children, violating his rights under the Fourteenth Amendment and his God-given familial bonds.

Defendants acted willfully and with reckless disregard for Plaintiff's rights, failing to provide full disclosure of their actions or any legitimate justification for their interference.

#### **C. Supporting Evidence and Full Faith and Credit**



Plaintiff submits the following evidence to support his claims and seeks recognition of these documents under the Full Faith and Credit Clause:

Apostilled live birth certificates of Plaintiff's children, verifying his parental rights.

Certified mail receipts (*PS 3811 green cards*) and stamped notices confirming legal communications sent to Defendants.

Body camera footage provided by the Monroe County District Attorney's Office, documenting the conduct of law enforcement during the arrest.

A letter from Safety National Insurance Company (Claim Number GL1011355179), dated July 9, 2024, acknowledging liability after receiving Plaintiff's final notice of default and estoppel.

These materials demonstrate the unjustifiable actions of the Defendants and underscore the necessity for accountability, transparency, and restitution.

## **V. CLAIMS FOR RELIEF**

### *COUNT I: VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983*

Defendants acted under color of law to deprive Plaintiff of his Fourth Amendment rights against unlawful seizure and his Fourteenth Amendment rights to due process and equal protection.

Their actions caused significant harm to Plaintiff, undermining his dignity and faith in the rule of law.

### *COUNT II: FALSE ARREST*

Plaintiff was arrested and detained without probable cause, constituting a violation of federal law and his fundamental right to liberty.

The arrest was executed under the color of law and in contravention of established legal protections.

### *COUNT III: CONSPIRACY TO VIOLATE RIGHTS UNDER 18 U.S.C. § 241*

Defendants conspired to deprive Plaintiff of his constitutional rights, including his parental rights and personal liberty.

This conspiracy reflects a willful disregard for the principles of fairness and justice.

### *COUNT IV: DEPRIVATION OF RIGHTS UNDER COLOR OF LAW UNDER 18 U.S.C. § 242*

Defendants, acting under color of law, knowingly and maliciously deprived Plaintiff of his rights, causing irreparable harm to his family and reputation.

## **VI. PRAYER FOR RELIEF**





With faith, hope, and love, Plaintiff respectfully requests this honorable Court to grant the following relief:

A declaration that Defendants' actions violated Plaintiff's constitutional rights under the Fourth and Fourteenth Amendments.

An injunction requiring Defendants to restore Plaintiff's parental rights and refrain from further interference in his family life.

Recognition of the submitted evidence under the Full Faith and Credit Clause, including the Certificate of Disposition, live birth certificates, and legal communications.

Compensatory damages for emotional distress, reputational harm, and economic losses sustained by Plaintiff.

Punitive damages to deter future violations of constitutional rights and to reaffirm the values of love, accountability, and justice.

Any additional relief that this Court deems just and proper in the spirit of fairness and equity.

Respectfully Submitted,

Adam-Eli: Stauffer

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